



THE LEAGUE OF WOMEN VOTERS OF CALIFORNIA

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Re: Comments on Draft Bulletin 160-98

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Dear Ms. Jones:

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The League of Women Voters of California (LWVC) believes a planning document such as The California Water Plan Update: Bulletin 160-98 should be part of the state's process for managing water, one of its precious natural resources. Indeed, management and development of water resources in ways that benefit the environment are the main thrust of the LWVC water position. Accordingly, the League has participated in previous efforts on the part of the Department of Water Resources (DWR) to create a planning document for the management of this valuable resource. We acknowledge the considerable effort expended to produce the document, but we wish to comment on five major concerns which we believe create major flaws in draft Bulletin 160.

Because of these concerns, the League urges DWR to incorporate into this effort and all future efforts a review of the document by independent experts, including economists, to assist in revisions to the Bulletin. Unless there is time allotted and adequate expertise brought to bear in correcting the document, the League does not believe that its projections should be used in the CALFED process as a baseline for analyzing the three CALFED alternatives. We will notify CALFED of this concern but hope than an extension in DWR's and CALFED's comment period will allow enough time for adequate revisions.

Our objections to the Bulletin as presently drafted include the following:

- ☐ While the draft is full of useful data and information, the League agrees with the Environmental Defense Fund, Natural Resources Defense Council and other groups that it has a flawed methodology which leads to gross overestimations of the need for future water supplies and serious underestimations of the results of demand side management and future water efficiencies.

For example, the persistent groundwater overdraft in the Central Valley is included in DWR's "shortage" calculations. This is an error. Overdraft is a voluntary practice used by some segments of agriculture to farm at levels which we believe are not sustainable. One

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solution that DWR could promote is statewide standards for groundwater management with local, basin, or regional development and implementation of plans tailored to the carrying capacity and characteristics of each basin.

Alternately, DWR could acknowledge the influence of the price of water on the demand for water and develop a range of demand-price relationships that would link price with supply and demand projections. Such a planning tool was incorporated into the Central Valley Project Improvement Act's Draft Programmatic Environmental Impact Statement and can provide a useful guide to future water management decisions.

- ☐ We disagree with the draft's emphasis on structural solutions, which we perceive as the Bulletin's primary focus for addressing the state's water needs for the future. In line with its methodology and inflated projections, we think the Bulletin's recommendations rely too heavily on the construction of new onstream and offstream water facilities primarily from the Sacramento River Basin. The League urges DWR to rethink this emphasis and analyze to a greater extent less environmentally damaging nonstructural supply options.

As stated previously, the League's emphasis is on managing water in ways that are beneficial to the environment with emphasis on conservation. Our position strongly supports nonstructural alternatives such as conservation and conjunctive use and the increase in recycling of wastewater. The League could support new offstream storage which is environmentally compatible but would not support new additional onstream dams.

The draft Bulletin recommends for serious consideration in the Sacramento Valley 13 onstream projects, including Auburn Dam and the enlargement of Shasta Dam. Seven new offstream storage facilities are also included for north of the Delta. These recommendations are made despite the fact that the draft confirms that larger projects tend to produce greater impacts on the environment.

South of the Delta, only five sites are considered, including a new offstream reservoir on Los Banos Creek. The draft acknowledges that the Los Banos Creek site has the most potential negative environmental impacts, which would seem to cloud its future.

We think the storage proposed would place a heavy burden on the Sacramento Valley if implemented and also might ignore nonstructural possibilities both north and south of the Delta.

Another source of water supply reliability both for environmental purposes and for other beneficial uses is the PG&E reservoirs previously managed for power production but now being divested by the utility. The potential for including these existing reservoirs in the state's planning needs further exploration.

Given the League's emphasis on conservation and reclamation as a preferred means of meeting the state's water reliability needs, we believe Chapter 6 shows inadequate analyses of nonstructural options on the demand side of the equation and over reliance on the traditional engineering approach of developing more surface storage facilities on the supply side.

- ☐ The discussion of costs to construct these new storage facilities in the draft Bulletin is inadequate for meaningful public review, especially given the economic impact of constructing these proposed new

storage dams and reservoirs in order to meet the projected water supply needs. Since the Bulletin is a planning document, it is essential that DWR outline the economic pros and cons for its recommended new supply.

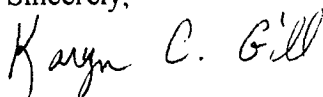
As we stated before, water supply and demand are closely related to price and subsidies, both of which can affect the demand for new supply. Yet, the Bulletin does not have comprehensive analyses of how price or subsidies could affect demand; whether stakeholders would be willing to pay for large reservoirs; who would be the beneficiaries; and what sector and/or what geographical area would be negatively impacted. We do realize that the Bulletin does discuss costs in several sectors (Appendix 4A, 6A, the tables in Appendix 7) and that a short description of financing methods is included at the end of Chapter 6. Nevertheless, we believe the economic analysis provided is woefully inadequate for the type of evaluation that is needed.

The lack of economic analysis is a primary reason why the League believes the Bulletin's projections lack credibility and why analysis by panel of independent experts could do much to improve the Bulletin as a planning tool. An independent panel could indicate areas where changes are warranted, which could serve the state and the public very well. Indeed, the public's right to know mandates accurate information upon which to base its judgment of the adequacy of the recommendations of the Bulletin.

- ☐ Another concern is the Bulletin's discussion of environmental water. We believe this approach is in error. Labeling water for the environment as a consumptive demand similar to that of that of agriculture and urban uses is a misinterpretation of the fact that water is a resource and we are stewards of that resource. Environmental water should be equally important with other beneficial uses and recognized as a public trust. In fact, the Bulletin should emphasize the fact that the environment once received 100% of the water and now receives only 46%, a loss of over half the natural flow to both agricultural and urban uses and a major reason for the decline of migratory fish populations and loss of wildlife habitat.
- ☐ Finally, and far from least, LWVC is always concerned with public participation and public information. We think the draft falls short on both points. We believe the public review period should have been longer and that more of a dialogue between the public and staff could have taken place at public hearings. Because the assumptions in the draft are not explained, much less discussed, we believe it is difficult for the public to properly evaluate the recommendations. What has been presented to the public at large is a mass of data, much of it interesting but much of it confusing because the draft lacks a comprehensive analysis of assumptions used. We urge your thoughtful review and revision of the present draft.

Thank you for considering our comments. Attached are specific comments from the League of Women Voters of the Bay Area.

Sincerely,



Karyn C. Gill
President